

*Wisconsin Association
of Health Plans*

The Voice of Wisconsin's Community-Based Health Plans

April 15, 2021

TO: Julie Walsh, Office of the Commissioner of Insurance Legal Unit

FR: Kelsey Avery, Director of Public Policy and Communications

RE: Comments on Ins. 19

The Wisconsin Association of Health Plans appreciates the opportunity to comment on Ins. 19, a permanent rule to implement the Wisconsin Healthcare Stability Plan (WIHSP).

The Wisconsin Association of Health Plans is the voice of 12 Wisconsin community-based health plans that provide coverage to individuals, employers, and government programs across the state. Association members comprise seven of the 14 health plans that serve the individual market in 2021. Many Association members have served customers through the Exchange since it first opened for business in 2014.

The Wisconsin Association of Health Plans supported the bipartisan legislation that established WIHSP. Wisconsin's community-based health plans have also worked collaboratively with the Office of the Commissioner of Insurance (OCI) since 2018 to develop and implement the program's reporting and verification process. Health plans appreciate OCI's efforts to establish and maintain a well-run, effective program, and address health plan feedback throughout the implementation and rulemaking process. Health plans also commend Governor Tony Evers for appropriating full funding for WIHSP through his proposed 2021-23 Biennial Budget.

In each of its three years of operation, WIHSP has contributed to year-over-year reductions in average premiums. WIHSP is a documented success that continues to be a valuable tool for lending stability to the individual market. Continued state commitment to WIHSP will build upon premium reductions to date and further contribute to Wisconsin's high quality, competitive individual insurance market.